

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN THE MATTER OF DANAOS	§	
SHIPPING CO., LTD. AND	§	4:24-CV-02540
SPEEDCARRIER (NO.3) CORP. AS	§	NOTICE OF DEPOSITION
OWNERS AND/OR OPERATORS OF	§	
THE M/V STRIDE EXONERATION	§	
FROM OR LIMITATION OF	§	
LIABILITY, ET AL.		

**HABIBU OTHMAN KHAMIS' SECOND AMENDED NOTICE OF INTENTION TO  
TAKE THE ORAL AND VIDEOTAPED TRIAL DEPOSITION OF  
HABIBU OTHMAN KHAMIS**

- TO: Cosco (Cayman) Mercury Co., Ltd. by and through its attorneys of record, Richard A. Branca and Dimitri P. Georgantas, ROYSTON RAYZOR VICERY & WILLIAMS LLP P.C., 1415 Louisiana Street, Suite 2400, Houston, Texas 77002.
- TO: Tintom Land Holdings, Shamrock Marine LLC and Buffalo Marine LLC, and Buffalo Marine Service Inc., by and through its attorney of record, Ronald L. White, WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP., 900 Fannin Street, Suite 3300, Houston, Texas 77010.
- TO: Danaos Shipping Co., LTD, and Speedcarrier (No.3) Corp by and through its attorneys of record, Kelly C. Hartmann, Trenton J. Wallis and Jason P. Waguespack, GALLOWAY JOHNSON TOMPKINS BURR & SMITH, 1203 McKinney Street, Suite 1400, Houston, Texas 77379.
- TO: Ksennia Taigachev, Individually and As Representative of the Estate of Konstanin Taigachev, *Deceased*, and Slizkai Konstanti Taigachev Konstantinovich, by and through their attorneys of record, Brian Beckom and Brendan Fradkin, VUJASINOVIC & BECKCOM, 6363 Woodway, Suite 400, Houston, Texas 77057.

Pursuant to the Federal Rule of Civil Procedure 30, please take notice that the oral and video deposition of Habibu Othman Khamis, 2555 N. MacGregor, Houston, Texas will take place on **Wednesday, February 12, 2025, continuing thereafter from day to day until complete** and beginning at **10:00 a.m. EST** at the following location:

The Westin Wilmington  
818 Shipyard Drive  
Wilmington, Delaware 19801

The deposition will be taken by stenography and video and will continue day to day until completed within the timeframe provided under Rule 30. Court reporting, videographer services, and translator will be provided by Magna Legal Services. The Claimants and Petitioners are invited to attend and ask questions.

Respectfully submitted,

**ROBERTS MARKLAND LLP**

By: /s/ Sean A. Roberts  
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**ATTORNEYS FOR CLAIMANT**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served to all known counsel of record in accordance with the Federal Rules of Civil Procedure on February 10<sup>th</sup>, 2025.

**/s/ Sean A. Roberts**

Sean A. Roberts